

EXHIBIT B

IN THE DISTRICT COURT OF SEMINOLE COUNTY
STATE OF OKLAHOMA

— FILED —
SEMINOLE COUNTY
DISTRICT COURT
SEMINOLE DIVISION

JUN 26 2008

SHARON POST, Court Clerk
BY HJ DEPUTY

LUTHER WILLIAMS, JR. and)
CONNIE FAY WILLIAMS,)
husband and wife,)

Plaintiffs,)

vs.)

SEMINOLE HEALTH CENTER, L.L.C.)
d/b/a SEMINOLE MEDICAL CENTER;)
HUSSEIN TORBATI, P.A.C.;)
HARRY CHAYNE FISHER, D.O., and)
JEFFREY L. WATTS, M.D.,)

Defendants.)

No. S-CT-2008-47

PETITION

Plaintiffs, for causes of action against Defendants, state:

First Cause of Action

Plaintiff Luther Williams, Jr., for this First Cause of Action, alleges and states:

1. Plaintiffs are residents of Pottawatomie County, Oklahoma. One or more of the Defendants can be served in Seminole County. The Court has jurisdiction and venue.

2. On June 27, 2006, Plaintiff Luther Williams, Jr., presented as a patient at the Emergency Room at Seminole Medical Center and was examined and treated by Hussein Torbati, P.A.C. A chest x-ray was ordered and performed at the Seminole Medical Center and was later interpreted by Jeffrey L. Watts, M.D. who reported that an underlying lung mass could not be excluded and therefore, a chest CT was recommended. This recommendation was never brought to the attention of Plaintiff Luther Williams, Jr. The

failure to bring this recommendation to Plaintiff's attention constitutes medical negligence by all of the Defendants.

At all times pertinent hereto, Seminole Medical Center acted by and through its agents, servants and employees including, but not limited to, nurses, technicians, Hussein Torbati, P.A.C., and Harry Chayne Fisher, D.O. Further, Plaintiff alleges that on June 27, 2006, Harry Chayne Fisher, D.O. was the supervising physician for Hussein Torbati, P.A.C., and as such, Hussein Torbati acted as the agent, servant and employee of Harry Chayne Fisher, D.O.

3. In April 2007, Luther Williams, Jr. reported to physicians that he was spitting up blood and later diagnostic testing confirmed that he had lung cancer although additional testing reflected that the cancer had not metastasized to the brain. Then, subsequent to these events and particularly in April 2008, additional radiographic testing has now confirmed that Plaintiff has cancer of the brain and Plaintiff alleges that his lung cancer has, in fact, metastasized to his brain.

4. As the result of the negligence of the Defendants, Plaintiff Luther Williams, Jr. has sustained injury and damages. His damages exceed Ten Thousand Dollars (\$10,000.00).

WHEREFORE, Plaintiff Luther Williams, Jr. prays damages against Defendants in a sum exceeding Ten Thousand Dollars (\$10,000.00), interest and costs.

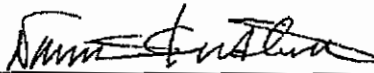
Second Cause of Action

For this Second Cause of Action against Defendants, Plaintiff Connie Fay Williams adopts paragraphs 1 through 4 of the First Cause of Action and further alleges and states:

1. Connie Fay Williams is the spouse of Plaintiff Luther Williams, Jr. As a result of the negligence of the Defendants and the resulting bodily injuries to Luther Williams, Jr., Plaintiff Connie Fay Williams has sustained damages in a sum exceeding Ten Thousand Dollars (\$10,000.00).

WHEREFORE, on the Second Cause of Action, Plaintiff Connie Fay Williams claims damages in a sum exceeding Ten Thousand Dollars (\$10,000.00), interest and costs.

ATTORNEYS LIEN CLAIMED
JURY TRIAL DEMANDED



David W. Edmonds, OBA #2625
David H. Cole, OBA #1776
Nevin R. Kirkland, OBA #19855
EDMONDS COLE LAW FIRM
One North Hudson, Suite 200
Oklahoma City, Oklahoma 73102
Phone 405-272-0322
Fax 405-235-4654
Attorneys for Plaintiffs

IN THE DISTRICT COURT OF SEMINOLE COUNTY
STATE OF OKLAHOMA

ISSUED
2008-08

LUTHER WILLIAMS, JR. and
CONNIE FAY WILLIAMS,
husband and wife,

Plaintiffs,

vs.

No. S-CJ-2008-47

SEMINOLE HEALTH CENTER, L.L.C.
d/b/a SEMINOLE MEDICAL CENTER; et al.,
Defendants.

SUMMONS

To the above-named Defendant(s):

Seminole Health Center, L.L.C.
c/o Michael Schuster, Registered Agent
3555 N.W. 58th St., Ste 1000
Oklahoma City, OK 73112

You have been sued by the above-named plaintiff(s), and you are directed to file a written answer to the attached petition in the court at the above address within twenty (20) days after service of this summons upon you, exclusive of the day of service. Within the same time, a copy of your answer must be delivered or mailed to the attorney for the plaintiff(s).

Unless you answer the petition within the time stated, judgment will be rendered against you with costs of this action.

ISSUED this 24 day of July, 2008.

SHARON POST, Court Clerk

By: David W. Edmonds
Deputy Court Clerk

David W. Edmonds, OBA #2625
Edmonds Cole Law Firm
One North Hudson, Suite 200
Oklahoma City, Oklahoma 73102
(405) 272-0322
ATTORNEYS FOR PLAINTIFF

This summons was served on _____.

YOU MAY SEEK THE ADVICE OF AN ATTORNEY ON ANY MATTER CONNECTED WITH THIS SUIT OR YOUR ANSWER. SUCH ATTORNEY SHOULD BE CONSULTED IMMEDIATELY SO THAT AN ANSWER MAY BE FILED WITHIN THE TIME LIMIT STATED IN THE SUMMONS.

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

*Seminole Health Center LLC
c/o Michael Schueter,
Registered Agent
555 N.W. 58th St., Ste 1000
Oklahoma City OK 73112*

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Michael Schueter

☐ Agent

☐ Addressee

B. Received by (Printed Name)

Michael Schueter

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

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☐ Registered ☐ Return Receipt for Merchandise

☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

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Domestic Return Receipt

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AWC

EDMONDS COLE LAW FIRM, P.C.
ONE NORTH HUDSON, SUITE 200
OKLAHOMA CITY, OK 73102

Williams v. SEC